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21 *Co-Chair Common Benefit Fee and Cost Committee*

22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 In Re Bard IVC Filters Products
25 Liability Litigation

No. MD-15-02641-PHX-DGC

MOTION TO FILE UNDER SEAL

(Filed *Ex Parte*)

26 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
27 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
28 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
Local Civil Rule 5.6 for leave to file under seal Status Report.

The Status Report pertains to a confidential hearing and contains confidential
information relevant to all fee applicants. Furthermore, as the Court is undoubtedly aware,
all filings related to the Common Benefit Fee and Cost Committee have been filed under
seal in this litigation. Accordingly, good cause exists for sealing the Status Report.

1
2 RESPECTFULLY SUBMITTED this 10th day of June 2022.

3 BEUS GILBERT MCGRODER PLLC

4
5 By: /s/ Mark S. O'Connor

6 Mark S. O'Connor

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26 *Co-Chair, Common Benefit Fee and Cost*
27 *Committee*

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June 2022, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine